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November 7, 2008

By Electronic Filing

Ex Parte Communication

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W., Room TW-325
Washington, DC 20554

**Re: True LD, LLC and STi Prepaid, LLC
WC Docket No. 08-92**

Dear Ms. Dortch,

On October 3, 2008, APCC Services, Inc., filed an ex parte letter to inform the Commission of the continuing failure of True LD, LLC's ("True LD's") "alter egos," West Star Telecommunications, LLC ("West Star"), and Global Access LD, LLC (Global Access"), and their principal, Jeffrey Larsen, to respond to any of the notices of apparent liability and informal complaints pending against them.

It is now more than six weeks since the extended September 15, 2008, due date -- granted by the Enforcement Bureau in response to Mr. Larsen's last-minute request -- for responses by West Star and Global Access to APCC Services' complaint in File No. EB-08-MDIC-0042. We have received confirmation from the Enforcement Bureau that Mr. Larsen *still* has not responded to any of the outstanding informal complaints or NALs, nor has he sought any further extensions to do so. In short, he continues to defy the Commission's processes.

APCC Services remains concerned that, in continuing his failure to respond, Mr. Larsen is hoping to "run out the clock" on the pending asset transfer application.¹ The Commission must not allow Mr. Larsen's strategy of delay to frustrate its processes.

As discussed in APCC Services' prior filings, the Commission should not act on the pending transfer application until, at a minimum, both Jeff Larsen and the Larsen-owned carriers (1) submit to the Commission's jurisdiction in all pending NAL and complaint proceedings, (2) resolve the pending NALs, and (3) correct the violations raised in those proceedings by responding to the pending informal complaints. Further, in light of the history of evasion by these companies and the consequent danger that there will be insufficient assets to satisfy Commission orders to pay compensation, the Commission should require True LD to post security, out of the proceeds of the sale, sufficient to cover the total amount of unpaid compensation alleged in the pending complaints.

¹ The Commission's rules provide that "[e]xcept in extraordinary circumstances, final action on the application should be expected no later than 180 days from public notice that the application has been accepted for filing," *i.e.*, in this case, December 22, 2008.

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Sincerely,

A handwritten signature in black ink, appearing to read "Robert F. Aldrich". The signature is written in a cursive style with a large, stylized initial "R".

Albert H. Kramer
Robert F. Aldrich

Enclosures

cc: Tracy Bridgham
Jodie May
Dennis Johnson